

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 901 NORTH 5TH STREET KANSAS CITY, KANSAS 66101

OCT 10 2000

Mr. Don Neumann Programs Engineer Federal Highway Administration 209 Adams Street Jefferson City, MO. 65101

re Review of Draft Environmental Impact Statement for the Route 50 East-Central Corridor Study - Osage, Gasconade, and Franklin Counties, Missouri

Dear Mr. Neumann

The Environmental Protection Agency has reviewed the Draft Environmental Impact Statement (DEIS) for the Route 50 East-Central Corridor Study. Our review is provided pursuant to the National Environmental Policy Act (NEPA) 42 U.S.C. 4231, Council on Environmental Quality (CEQ) regulations 40 C.F.R. Parts 1500-1508, and Section 309 of the Clean Air Act (CAA). The DEIS was assigned the Council on Environmental Quality (CEQ) number 000428.

Based on our review, the DEIS adequately describes the proposed action and it's environmental implications. EPA accordingly has rated this DEIS as "LO" which corresponds to a "Lack of Objections". A copy of EPA's rating system is provided for your reference as an attachment to this letter.

As the Federal Highway Administration and the Missouri Department of Transportation prepares the Final Environmental Impact Statement, EPA would suggest that additional development be afforded to the following areas:

1. Section 2.17-18 in which describes Economic Impact of the project as based upon a rating system. From the documentation, this rating system appears inconsistent. While some categories were assigned points, others were not. Inconsistency of this rating system may have led to the selection of Gasconade 1 as the preferred alternative over Gasconade 2. After careful review of Table 2-5: Summary Impact Matrix (2-43), it seems intuitive that Gasconade 2 would present the preferred solution based on cost analysis and potential impacts. It is stated in the DEIS that there

is "little difference" between the two alternatives (2-45), yet Gasconade 1 has been identified as favorable over Gasconade 2. The differences of these two alternatives and the rationale for selection of the preferred alternative should be better documented in the FEIS.

- 2. As a public disclosure document, the FEIS should endeavor to reflect plain language that enables affected communities and individuals to read, review and understand what action(s) are proposed to be undertaken (i.e., summary page should be as concise as possible, specifically outlining objectives and alternative options, charts should have readily available plain language and translations).
- 3. The DEIS presents ample detail on wildlife species and flora found within the project area, however, more discussion would be helpful to understand the possible ramifications of the project on these resources, and conversely, if the project has been modified to accommodate any particular resource (i.e., critter crossings, bat roosts, ecosystem support provision).

Additionally, the Region 7 Wetlands Protection Group has reviewed the DEIS and has offered comments as follows:

- 1. The maps and tables provided were very helpful, however; Table 4.40 does not reference back to the alternatives in Figures 2.5 through 2.7. It would helpful in future documents to reference back to those figures when information on alternatives is provided in tables.
- 2. The DEIS does not document the moving of any stream segments. Does this lack of documentation mean there will be no stream relocations? If there will be stream impacts, the FEIS should clearly identify any potential adverse impacts or relocations.
- 3. EPA will be interested in seeing in the FEIS the determination of what the quality of palustrine emergent wetlands.

In closing, EPA recommends a continuous re-evaluation of individual environmental impacts as well as cumulative impacts as the project proceeds towards the final design. EPA would like to commend the Federal Highway Administration and the Missouri Department of Transportation for their efforts in interagency coordination, seeking public participation, and for exploring a range of alternatives in the NEPA process. If you have any questions, please contact me at (913)551-7168.

Sincerely, Jama Toolin Chestrut

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NEPA Reviewer